

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS)
LIABILITY LITIGATION) MDL No. 1:13-md-2419-FDS
This Document Relates to:)
All Cases) Judge Rya W. Zobel

**DEFENDANT AMERIDOSE LLC'S JOINDER IN THE MOTION FOR A
PROTECTIVE ORDER FILED BY CERTAIN INDIVIDUAL DEFENDANTS**

Between them, the Tennessee Clinic Defendants and the Premier Defendants issued deposition notices for five people who were either owners or agents of Ameridose LLC: Barry J. Cadden, Lisa Conigliaro-Cadden, Greg Conigliaro, Carla Conigliaro and Doug Conigliaro. On May 4, 2015 those individuals, through counsel, filed a Motion for Protective Order from those depositions (Docket No. 1823).

It is possible that any of those five individuals would, in the proposed depositions, be called upon to answer questions about or speak for Ameridose LLC, or that an examiner would claim that one or more of them would theoretically qualify as a FRCP 30(b)(6) witness for Ameridose LLC. Therefore, Ameridose LLC joins in the Motion for Protective Order filed by those individuals and adopts the arguments set forth in their brief in support.

Respectfully submitted,

/s/ Matthew P. Moriarty
Matthew P. Moriarty (0028389)
Richard A. Dean (0013165)

Tucker Ellis LLP
950 Main Avenue
Suite 1100
Cleveland, OH 44113-7213
Tel: 216.592.5000
Fax: 216.592.5009
E-mail: richard.dean@tuckerellis.com
matthew.moriarty@tuckerellis.com

CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2015, a copy of the foregoing **Defendant Ameridose LLC's Joinder in the Motion for a Protective Order filed by Certain Individuals** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Matthew P. Moriarty
Matthew P. Moriarty (0028389)
Richard A. Dean (0013165)
Tucker Ellis LLP
950 Main Avenue
Suite 1100
Cleveland, OH 44113-7213
Tel: 216.592.5000
Fax: 216.592.5009
E-mail: richard.dean@tuckerellis.com
MMoriarty@tuckerellis.com